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BRICKFIELD BURCHETTE
RITTS & STONE, PC

WASHINGTON, D.C.
AUSTIN, TEXAS

May 2, 2008

Mr. Charles Terreni
Chief Clerk
101 Executive Center Dr., Suite 100
Columbia, SC 29210




RECEIVED
2008 MAY -5 AM 9:38
SC PUBLIC SERVICE
COMMISSION

Re: Annual Review of Base Rates for Fuel Costs of Carolina Power & Light
Company d/b/a Progress Energy Carolinas, Inc.
Docket No. 2008-1-E

Dear Mr. Terreni:

Enclosed for filing is Nucor Steel-South Carolina's Second Set of Continuing
Data Requests to PEC in the above referenced matter.

Sincerely,



Michael K. Lavanga

Enclosure

**BRICKFIELD BURCHETTE
RITTS & STONE, PC**

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AUSTIN, TEXAS

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COMMISSION


Len S. Anthony, Esq.
Carolina Power and Light Company d/b/a
Progress Energy Carolinas, Inc.
Legal Department – PEB 17A4
Post Office Box 1551
Raleigh, NC 27602

Re: Annual Review of Base Rates for Fuel Costs of Carolina Power & Light
Company d/b/a Progress Energy Carolinas, Inc.
Docket No. 2008-1-E

Dear Len:

I have enclosed Nucor Steel-South Carolina's Second Set of Continuing Data Requests to PEC in the above referenced matter. Please let me know if you have any questions.

Sincerely,



Garrett A. Stone
Michael K. Lavanga

Enclosure

cc: Shealy Boland Reibold, Esq.
Nanette S. Edwards, Esq.

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2008-1-E

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2008 MAY -5 AM 9:38
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COMMISSION

In the Matter of:)	
)	
Annual Review of Base Rates for Fuel)	NUCOR-STEEL
Costs of Carolina Power & Light)	SOUTH CAROLINA'S
Company d/b/a Progress Energy)	SECOND SET OF
Carolinas, Inc.)	CONTINUING DATA REQUESTS
)	TO PEC

Nucor Steel-South Carolina ("Nucor") hereby propounds the following data requests (interrogatories and requests for production of documents) to Progress Energy Carolinas, Inc. ("PEC") and requests that the information and documents requested below be provided within 20 days of receipt of this request by PEC. These requests are continuing in nature and PEC is requested to provide any and all information available as of the date of the response and then complete or update the response as necessary as additional information becomes available.

INSTRUCTIONS

1. In answering each Request, please state the text of the Request prior to providing the response. Each Request and applicable response should be on a separate page. Where there are subparts to a Request, each subpart and applicable response should be on a separate page. Each Request is continuing in nature. Thus, if PEC acquires or discovers additional or different information with respect to a Request after the Request has been initially answered, PEC is required to supplement its response immediately following the receipt of such additional or different information, giving the additional or different information to the same extent as originally requested. PEC may not postpone serving such responsive supplemental information until after the filing of any testimony or supporting documents in this proceeding. Initial and supplementary responses shall be full, complete and accurate since they will be relied upon by Nucor for the purposes of this proceeding. For each Request, list all assumptions made by PEC in answering said Request.
2. In the event that PEC asserts that any of the information requested is deemed by it to be privileged or proprietary, then PEC in its written response should identify any such data, and any supporting documents, by date and general content. PEC should also identify all persons who participated in the preparation of the document and all persons, inside or outside PEC, who received a copy, read, or examined any such document. In addition, PEC should indicate its claim of privilege with particularity and describe the grounds upon which privilege is claimed. State the present location of the document and all copies thereof and identify each person having custody or control of the document and said copies.

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NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS

3. To the extent that PEC asserts that any requested information is not relevant or not material to any issue in the above-captioned matter, PEC, in its written response hereto, should indicate a specific basis for said assertion in the context of any issues arising in this proceeding.
4. In the event PEC asserts that any requested information is not available in the form requested, PEC, in its written response thereto, should disclose the following:
 - (a) the form in which the requested data currently exists (identifying documents by title);
 - (b) whether it is possible under any circumstances for PEC to provide the data in the form requested;
 - (c) the procedures or calculation necessary to provide the data in the form requested;
 - (d) the length of time (in hours or days) necessary for PEC to prepare the data in the form requested; and
 - (e) the earliest dates, time period, and location that representatives of Nucor may inspect PEC's files, records or documents in which the requested information currently exists.
5. The Requests contained herein contemplate that individual copies of any documentary material requested will be provided to Nucor as is the usual custom in regulatory proceedings. In the event that PEC asserts that any requested documents are too voluminous, or, for some other reason, copies cannot be provided to Nucor, PEC is requested to make such voluminous or otherwise undeliverable documentary material available for inspection as of the date of the required written responses at such time and place as may be mutually agreed upon among counsel for the parties. PEC is requested to provide notice to Nucor at least two Business Days in advance of the date of the required written responses that it contemplates asserting that any requested documents will be too voluminous to provide Nucor with individual copies, or will otherwise be undeliverable according to PEC. PEC is also requested to provide notice no less than 2 Business Days in advance of the date of required written responses estimating the size and character of any voluminous materials and/or documents, and to provide copying of any noticed materials pursuant to Nucor's designation at Nucor's expense at that time.
6. In providing documents, PEC is requested to furnish all documents or items in its physical possession or custody, as well as those materials under the physical possession, custody or control of any other person acting or purporting to act on behalf of PEC or any of PEC's employees or representatives, whether as an agent, independent contractor, attorney, consultant, witness, or otherwise. If documents responsive to a request existed at one time but have been discarded, lost or destroyed, please describe by category such documents, state the identity of the person having knowledge of the circumstances of their discard, loss or destruction, and state the date on which such documents were discarded, lost or destroyed.
7. To the extent any requested document cannot be provided in full, it shall be provided to the extent possible, with an indication of what document or portion of what document is being withheld and the reasons for withholding said document.
8. Documents are to be produced as they are kept in the usual course of business. To the extent that they are attached to each other, documents should not be separated.

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9. Documents not otherwise responsive to this Request shall be provided if such documents are attached to documents responsive to this Request, and constitute routing slips, transmittal memoranda, letters, comments, evaluations, or similar materials.
10. For each Request answered, provide the name of the person or persons answering, the title of such persons and the name of the witness or witnesses who will be prepared to testify concerning the matters contained in each response or document provided. PEC shall provide all responses under oath.
11. Unless otherwise indicated, the following Requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2006, through and including the date of your response.
12. Where these Requests seek quantitative or computational information (e.g., models, analyses, databases, formulas) stored by PEC or its consultants in machine-readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Excel file format.
13. To the extent possible, where these Requests seek non-quantitative narrative information (e.g., studies, reports, memorandum, correspondence) stored by PEC or its consultants in machine readable form, in addition to providing a hard copy, PEC is requested to furnish such machine-readable information on CD-ROM in MS Word format.
14. Responses to any of these Requests may include incorporation by reference to responses to other Requests only under the following circumstances:
 - (a) the reference is explicit and complies with instruction 11; and
 - (b) unless the entirety of the referenced response is to be incorporated, the specific information or documents of the referenced response shall be expressly identified.
15. Nucor requests that PEC send by overnight delivery service (such as Federal Express or a comparable service) one copy of its responses to this Request to each of the following:

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone, P.C.,
1025 Thomas Jefferson Street, NW
Eighth Floor-West Tower
Washington, DC 20007

Thomas S. Mullikin
Robert R. Smith II
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202

Responsive information and documents should be provided as they become available and should not be withheld until a complete response to all of Nucor's requests is available.

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DEFINITIONS

1. "PEC" refers to Carolina Power & Light d/b/a Progress Energy Carolinas, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
2. "PSC" means the South Carolina Public Service Commission.
3. "Nucor" means Nucor Steel-South Carolina.
4. "Historical period" refers to the time period between April 1, 2007 and March 31, 2008.
5. "Forecast period" or "projected period" refers to the time period between April 1, 2008 and June 30, 2009.
6. "Identify" means as follows:
 - (a) when used in reference to an individual, to state his full name and present or last known residence address and telephone number, his present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - (b) when used in reference to a commercial or governmental entity, to state its full name, type of entity (*e.g.*, corporation, partnership, single proprietorship), and its present or last known address;
 - (c) when used in reference to a document, to state the date, author, title, type of document (*e.g.*, letter, memorandum, photograph, tape recording, etc.) and its present or last known location and custodian;
 - (d) when used in reference to a communication, to state the type of communication (*i.e.*, letter, personal conversation, etc.), the date thereof, and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto; and
 - (e) when used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present.
7. The term "document" as used in the Requests contained herein is used in its customary broad sense, and includes, without limitation, any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes reports, studies, statistics, projections, forecasts, decisions and orders, e-mail communications, intra-office and inter-office communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, graphs, sketches, computer printouts, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, brochures, bulletins, pamphlets, books, articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic, mechanical and electrical records of any kind (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, without limitation, input/output files, source codes, object codes, program

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documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes and amendments to the foregoing, and all other documents or tangible things of whatever description that constitute or contain information within the scope of a Request that are in the possession of PEC. A Request seeking the identification or production of documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or provided; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production.

8. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, e-mail and personal conversations. A Request seeking the identity of a communication addressing, relating or referring to, or discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.
9. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
10. Words expressing the singular number shall be deemed to express the plural number; those expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
11. The unqualified terms "or" and "and" shall be construed either conjunctively or disjunctively to bring within the scope of these Requests any matters that might otherwise be construed to be outside their scope.
12. The unqualified term "person" shall mean an individual, corporation, partnership, unincorporated association or other business or governmental entity.
13. The term "e.g." or "for example" indicates illustration by example, not limitation.

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QUESTIONS

NUC-2-1 Referring to any disputes (contract or otherwise) between PEC and its coal suppliers and/or railroads since January 1, 2008:

- (a) Explain in detail the nature of the dispute.**
- (b) Explain in detail how the dispute has affected PEC's price for coal in the historic or forecast period.**
- (c) Explain in detail whether the dispute has been resolved and, if not, what actions PEC is taking to resolve the dispute.**
- (d) If the dispute has been resolved, explain in detail how it was resolved.**
- (e) Provide all relevant documents and correspondence.**

NUC-2-2 For the forced outage at Brunswick Unit 1 beginning on 4/1/07 please provide:

- (a) All corrective action documents related to the outage including condition reports, event investigation reports, root cause evaluation reports or any similar corrective action document.**
- (b) All correspondence to or from the NRC regarding the outage including Licensee Event Reports, NRC Inspection Reports, Requests for Information, etc.**
- (c) All reports or presentations provided to senior management related to the cause and/or duration of this outage.**
- (d) Explain in detail the cause of the outage and why PEC believes the outage was not the result of unreasonable actions by PEC (describe and provide any related evidence).**
- (e) Justify in detail the length of the outage and why the length was reasonable and not unreasonably extended by PEC actions (describe and provide any related evidence).**

NUC-2-3 For the scheduled outage at Brunswick Unit 1 beginning on 9/8/07 please provide:

- (f) All corrective action documents related to the outage including condition reports, event investigation reports, root cause evaluation reports or any similar corrective action document.**
- (g) All correspondence to or from the NRC regarding the outage including Licensee Event Reports, NRC Inspection Reports, Requests for Information, etc.**
- (h) All reports or presentations provided to senior management related to the cause and/or duration of this outage.**
- (i) The planned duration of the outage.**
- (j) The actual duration of the outage.**

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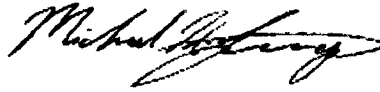
- (k) If the actual outage duration was longer than planned, a description of the reason for the outage extension including all relevant reports related to the outage extension.
- (l) Explain in detail the cause of the outage and why PEC believes the outage was not the result of unreasonable actions by PEC (describe and provide any related evidence).
- (m) Justify in detail the length of the outage and why the length was reasonable and not unreasonably extended by PEC actions (describe and provide any related evidence).

NUC-2-4 For the refueling outage extension at Brunswick Unit 2 beginning on 4/1/07 please provide:

- (a) A detailed description of the work that was done during the outage extension.
- (b) A critical path schedule showing the activities responsible for the outage extension.
- (c) All corrective action documents related to the outage extension including condition reports, event investigation reports, root cause evaluation reports or any similar corrective action document.
- (d) All correspondence to or from the NRC regarding the outage extension including Licensee Event Reports, NRC Inspection Reports, Requests for Information, etc.
- (e) All reports or presentations provided to senior management related to the cause and/or duration of this outage.
- (f) The planned duration of the outage extension.
- (g) The actual duration of the outage extension.
- (h) If the actual outage extension duration was longer than planned, a description of the reason for the duration variance including all relevant reports related to the duration variance.
- (n) Explain in detail the cause of the outage extension and why PEC believes the outage extension was not the result of unreasonable actions by PEC (describe and provide any related evidence).
- (i) Justify in detail the length of the outage extension and why the length was reasonable and not unreasonably extended by PEC actions (describe and provide any related evidence).

* * * * *

SOUTH CAROLINA PUBLIC SERVICE COMMISSION, DOCKET NO. 2008-1-E
NUCOR'S SECOND SET OF CONTINUING DATA REQUESTS



Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts, & Stone, P.C.
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8th Floor West
Washington, DC 20007
(202) 342-0800

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Robert R. Smith, II
Moore & Van Allen, PLLC
100 North Tryon Street
Suite 4700
Charlotte, NC 28202
(704) 331-3580

**BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2008-1-E

In the Matter of:

**Annual Review of Base Rates for Fuel Costs
of Carolina Power & Light Company d/b/a
Progress Energy Carolinas, Inc.**

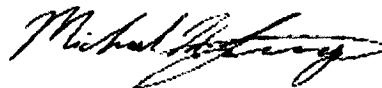
Certificate of Service

This is to certify that a copy of the foregoing document, **NUCOR STEEL-SOUTH CAROLINA'S SECOND SET OF CONTINUING DATA REQUESTS TO PEC**, was served upon the following parties at the addresses set forth by first-class mail, electronic mail, telefax, or Federal Express on this the 2nd day of May, 2008:

Len S. Anthony, Esq.
*Carolina Power and Light Company d/b/a
Progress Energy Services Company*
Legal Department - PEB 17A4
Post Office Box 1551
Raleigh, NC 27602

Shealy Boland Reibold, Esq.
Nannette S. Edwards, Esq.
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

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